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11 Attorneys for Putative Defendants
12 Safeco Insurance Companies, Liberty
13 Mutual Group, and Safeco Corporation
14 and Defendant First National Insurance
15 Company of America

16 UNITED STATES BANKRUPTCY COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 In re:

19 HSR GENERAL ENGINEERING
20 CONTRACTORS, INC.,
21 Debtor.

Case No. 10-58737

Chapter 11

22 HSR GENERAL ENGINEERING
23 CONTRACTORS, INC.,
24 Plaintiff,

25 v.

26 SAFECO INSURANCE COMPANIES, et
27 al.,
28 Defendants.

Adversary No. 10-05309 CN

**MOTION TO FOR SANCTIONS AGAINST
PLAINTIFF**

Date: August 12, 2011
Time: 2:00 p.m.
Judge: Hon. Charles Novack
Location: San Jose Courthouse
Courtroom 3070

29 The Defendants seek an order awarding the Defendants their attorney's fees in bringing
30 their motion to compel and this companion motion to address HSR's discovery violations.

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1 DATED: July 13, 2011

SEDGWICK LLP

2 By: /s/ Joel M. Long

Joel M. Long

3 Attorneys for Putative Defendants Safeco Insurance
4 Companies, Liberty Mutual Group, and Safeco
5 Corporation, and Defendant First National Insurance
6 Company of America
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